

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN CIVIL LIBERTIES UNION,

Plaintiff,

v.

UNITED STATES CUSTOMS AND
BORDER PROTECTION and UNITED
STATES IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Defendants.

No. 1:19-cv-11311 (JSR)

MOTION OF ALEXIA RAMIREZ TO WITHDRAW AS COUNSEL

Pursuant to United States District Court for the Southern District of New York Local Civil Rule 1.4, Alexia Ramirez, undersigned counsel, moves to withdraw as counsel for Plaintiff American Civil Liberties Union in the above-captioned matter. In support of this motion, she shows as follows:

1. She is an attorney for Plaintiff American Civil Liberties Union in the above-entitled action.
2. She entered her appearance as counsel on April 13, 2020.
3. Her last day as an attorney with the American Civil Liberties Union Foundation's Speech, Privacy & Technology Project is September 3, 2020.
4. She does not anticipate that her withdrawal as counsel will adversely affect her client.
5. Plaintiff will continue to be represented by the American Civil Liberties Union Foundation and the New York Civil Liberties Union Foundation.
6. The parties' Stipulation and Order of Settlement and Dismissal was approved by the Court on August 31, 2020. This Court retains jurisdiction for the purpose of enforcing

the Stipulation and Order, as well as the parties' earlier Stipulation Regarding Certain Records, *see* ECF No. 41.

7. She is not retaining or charging a lien in this matter.
8. She has consulted with Plaintiff regarding this motion.

Dated: September 3, 2020

/s/Alexia Ramirez

Alexia Ramirez
Nathan Freed Wessler
Brett Max Kaufman
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2500
nwessler@aclu.org
aramirez@aclu.org
bkaufman@aclu.org

Robert Hodgson
Christopher Dunn
New York Civil Liberties Union Foundation
125 Broad Street, 19th Floor
New York, NY 10004
(212) 607-3300
rhodgson@nyclu.org
cdunn@nyclu.org

Counsel for Plaintiff